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13 Attorneys for Defendant
UNIVERSITY OF SOUTHERN CALIFORNIA

14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA
16

17 DOE JEWISH USC FACULTY
MEMBER 2004 and DOE JEWISH
18 USC STUDENT 1987, Individually
And On Behalf of All Others Similarly
19 Situated,

20 Plaintiffs,

21 v.

22 Trustees of THE UNIVERSITY OF
23 SOUTHERN CALIFORNIA, a private
24 public benefit corporation; and DOES 1
through 100, inclusive,

25 Defendants.
26
27
28

Case No. 2:24-cv-05712 FLA (SSC)

**DECLARATION OF RASHA
GERGES SHIELDS IN SUPPORT
OF DEFENDANT USC'S
OPPOSITION TO PLAINTIFFS' *EX
PARTE* APPLICATION**

[NO HEARING SET]

**Judge: The Honorable
Fernando L. Aenlle-Rocha**

1 I, Rasha Gerges Shields, declare as follows:

2 1. I am a partner at the law firm of Jones Day, counsel for Defendant
3 University of Southern California (“USC” or the “University”). I am a member in
4 good standing of this Court and of the State Bar of California. I have personal
5 knowledge of the facts set forth in this declaration and, if called as a witness, could
6 and would testify competently thereto.

7 2. On March 5, 2025, I received an email from plaintiffs’ counsel, E. Jay
8 Gotfredson, asking for an extension of time to amend the complaint to facilitate
9 mediation and avoid unnecessary work.

10 3. On the following day, Mr. Gotfredson and I spoke by telephone
11 regarding his request. On that call, I said that USC was not inclined to extend the
12 deadline without a good faith showing by plaintiffs that the mediation had any chance
13 of success, as plaintiffs had refused to engage in any prior settlement discussions. I
14 asked that plaintiffs make a good faith settlement offer to allow USC to determine
15 whether their requested extension should be granted to allow the parties to focus on
16 mediation.

17 4. Towards the end of the conversation, Mr. Gotfredson agreed to come
18 back with a settlement offer and also asked if USC would be willing to stipulate to
19 plaintiffs amending their complaint to add federal civil rights claims to avoid
20 additional motion practice. I asked Mr. Gotfredson to send me an email detailing the
21 claims plaintiffs sought to add, so that USC could evaluate plaintiffs’ proposal.

22 5. To date, Mr. Gotfredson has not provided me with a written proposal of
23 the specific claims plaintiffs intend to add.

24 6. Instead, on March 7, 2025, I received a notification from the CM/ECF
25 system that an *ex parte* application had been filed by plaintiffs. The CM/ECF
26 notification states that *ex parte* application was filed at 12:59 PM PST. Neither I nor
27 any of my colleagues were advised that plaintiffs would be filing an *ex parte*
28 application.

7. At 2:00 PM local time, I received an email from Mr. Gotfredson with the subject line “Re: Ex-Parte Application.” He described the email as a “Notice of ex parte application for extension request and our request to add 1983 action.” (emphasis omitted). Attached hereto as **Exhibit A** is a true and correct copy of Mr. Gotfredson’s March 7, 2025 email (redacted to exclude settlement communications pursuant to Federal Rule of Evidence 408).

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 9th day of March, 2025.

/s/ Rasha Gerges Shields
Rasha Gerges Shields

Exhibit A

Shields, Rasha G.

From: LawFirm <LawFirm@gotfredsonassociates.com>
Sent: Friday, March 7, 2025 2:00 PM
To: Shields, Rasha G.
Cc: LawFirm
Subject: Re: Ex-Parte Application

Follow Up Flag: Follow up
Flag Status: Flagged

This Message Is From an External Sender

If you are concerned about the message's content, highlight the email in your inbox and click "Report Suspicious" in the Outlook ribbon -or- contact 6Help.

Report Suspicious

Rasha, below is our notice of ex-parte application [REDACTED]

A. *Notice of ex parte application for extension request and our request to add 1983 action.*

Additional reason for request is our need to incorporate the DOJ's just announced investigation into USC's systemic antisemitism into our Second Amended Complaint ("SAC") and the additional time it will take us to complete our investigation into what the DOJ is asserting.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Jay

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